

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

Re: Notice of US LEC Corp. of "Bona Fide)
Request" for an Interconnection Agreement)
with TDS Local Exchange Carriers Pursuant)
to 47 U.S.C. § 251)

*02 MAR 20 PM 1 49
Docket No. 00-00026
OFFICE OF THE
EXECUTIVE SECRETARY

**FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS OF US LEC CORP.**

US LEC Corp. ("US LEC") serves upon the TDS Telecom Companies¹ the following written interrogatories to be answered under oath by an officer or agent of TDS on or before April 3, 2002.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of TDS, its attorneys, investigators, agents, employees, or other representatives of TDS and/or its attorneys.
2. Where an Interrogatory calls for an answer which involves more than one part, each part of the answer should be clearly set out so it is understandable.
3. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

¹ The TDS Telecom Companies in Tennessee are Concord Telephone Exchange, Inc., Humphreys County Telephone Company, Tellico Telephone Company and Tennessee Telephone Company (collectively "TDS").

INTERROGATORIES

INTERROGATORY No. 1: Provide a list of the top 100 business customers (according to total billed revenue) of Concord Telephone. Indicate the annual billed revenue of each customer and whether or not that customer is currently operating under either a contract or a tariff provision which would prevent the customer from switching to another local carrier or would require the customer to pay a termination penalty if the customer switched to another carrier. If so, provide a copy of that contract or tariff provision.

ANSWER:

INTERROGATORY No. 2: Provide the same information requested in Interrogatory No. 1 for the following customers:

- a. The top 25 business customers of Humphreys County Telephone.
- b. The top 50 business customers of Tellico Telephone.
- c. The top 600 business customers of Tennessee Telephone.

ANSWER:

INTERROGATORY No. 3: For each TDS company, describe the budgeting process including, but not limited to the following:

- a. How far in advance are operating and construction budgets prepared? On what basis is the total operating and construction budget determined? Explain the "approval process" in budget development.
- b. How many views or updates of the same budget year are made before a final view is adopted?
- c. Are budgets prepared on a monthly, quarterly, or annual basis?
- d. Which individual or department has overall responsibility for budgets/reconciliations?
- e. Once a final budget has been adopted, are budget to actual (reconciliations) comparisons routinely made? How frequently are reconciliations prepared by whom?
- f. For 2001 and 2002, provide copies of all budgets; budgets to actual comparisons; and all supporting work papers on a total Company and Tennessee only basis.

ANSWER:

INTERROGATORY No. 4: For each TDS carrier, provide a listing by name, business address, and contact person of all non-regulated operations or affiliates, including but not limited to, Internet, cable television, and long distance telephone service providers.

ANSWER:

INTERROGATORY No. 5: For each non-regulated operation or affiliate identified in item no. 1, above, provide a balance sheet and income statement for the years ended 2001 and year-to-date 2002.

ANSWER:

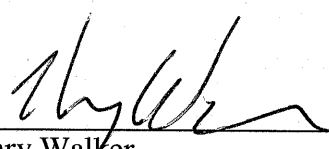
REQUEST FOR PRODUCTION OF DOCUMENTS

1. Provide the annual Report Form M, for the year 2001 for each TDS carrier operating in Tennessee and provide all supporting work papers.
2. For each TDS carrier, provide the most recent twelve months of TRA 3.01 monthly reports and all supporting work papers.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 20th day of March.

Dale R. Grimes, Esq.
Bass, Berry & Sims
2700 First American Center
Nashville, TN 37238-2700



Henry Walker